

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America

v.

Ramon Del Campo

Case No. 21-996 MJ

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 13, 2021 in the county of Dofia Ana in the  
District of New Mexico, the defendant(s) violated:

Code Section

18 U.S.C. 115(a)(1)(B)

Offense Description

Retaliating against a federal official

This criminal complaint is based on these facts:

See Attachment A, attached and incorporated herein.

☒ Continued on the attached sheet.Sworn to before me <sup>VIA TELEPHONE</sup> and signed in my presence.Date: 7/19/21City and state: Las Cruces, New Mexico

Complainant's signature

FBI Special Agent Kyle M. Seraphin

Printed name and title

Judge's signature

United States Magistrate Judge Gregory J. Fouratt

Printed name and title

**Affidavit**

1. I, Kyle M. Seraphin, am a Special Agent with the Federal Bureau of Investigation and have been employed as such for over 5 years. In my career, I have investigated numerous violations of a variety of federal statutes, including violent crimes, drug trafficking, public corruption, national security, and allegations of assaults made by subjects in violation of 18 U.S.C. § 115(a)(1)(B), Retaliating against a federal official.
2. The information set forth in this affidavit was derived from my own investigation and/or communicated to me by other sworn law enforcement officers. Because this affidavit is submitted for the limited purpose of securing a criminal complaint, your affiant has not included every fact known to me concerning this investigation. Your affiant has set forth only those facts that your affiant believes are necessary to establish that probable cause to support a criminal complaint against Ramon Del Campo, for Retaliating against a federal official, in violation of 18 U.S.C. § 115(a)(1)(B).

**Relevant Statutes**

3. 18 U.S.C. § 115(a)(1)(B), provides, in relevant part, “whoever threatens to assault, kidnap, or murder, a United States official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under such section, with intent to impede, intimidate, or interfere with such official, judge, or law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties, shall be punished as provided in subsection (b).
4. Title 18 U.S.C. § 1114, applies to, in relevant part, “any officer or employee of the United States or of any agency in any branch of the United States Government (including any member of the uniformed services).”

**Details of the Investigation**

5. Beginning on July 13, 2021, Ramon Del Campo, (herein referred to as Del Campo), a state detainee who was detained at the Dona Ana County Detention Center (DACDC) for

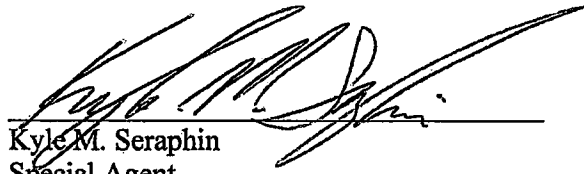
a probation violation, made a threatening phone call to Barbara Mandel of the Federal Public Defenders office of Las Cruces, New Mexico. During the prior week, the public defender's office called Lt. Patrick Howie of the DACDC to complain about Del Campo "calling and harassing them." Your affiant listened to the outbound phone call made by Del Campo to Ms. Mandel. The phone call included the following message: "This is Ramon Del Campo. Yes. I've made plans to kill federal judges: Parker, Riggins, Kia, Vasquez (spellings estimated). I got plans to kill state judges: Hotkis, Driggers. Call the feds, ya cock suckin' whore. Call the feds, that's a capital crime. Call the feds, I got a... I've got plans to kill 'em. Call the feds you fuckin' ... you federal...federal public defenders. (unintelligible) CALL THE FEDS! I'M GONNA KILL THOSE JUDGES!... Right? Call 'em, Bitch. Call the feds, I just made a threat. I'm killing judges off, ya hear me bitch? I'm going to kill judges off, bitch. Call. The. Feds. You Cocksucking whore."

6. Special Agent Armida Maria Macmanus spoke with representatives from the US Marshals Service regarding previous interactions with Del Campo. They advised Agent Macmanus that Del Campo was previous warned and banned from the US Marshal Service office and property due to previous threats made to federal officials.
7. On July 16, 2021, the USAO authorized a warrantless arrest for Del Campo based on the facts above. The US Marshal Service effected an arrest of Del Campo on the same day. He was transported to the US Marshal Service office.
8. FBI Agents from the Las Cruces Resident Agency met with Del Campo and conducted an interview after advising him of his Miranda rights. During this interview, Del Campo provided the following information: Del Campo admitted he had made the aforementioned threat from the DACDC; he admitted he knew who he had named in his threatening phone call; he admitted he made the threat in order to get retribution for his belief his rights had been violated ("to scare them to resolve this issue"); he filed 6 civil law suits in order to seek compensation for his belief and believes he is owed said compensation; he had no intentions or means to hurt or kill anyone, but hoped the FBI would investigate his allegations that his Constitutional rights were violated by police officers, judges, and the public defenders. Del Campo stated, "In the federal 10th Circuit, I filed 6 suits. Against the Gospel Rescue Mission, against the City of Hope, against the City of Las Cruces Police Department, against the State of New Mexico, against the

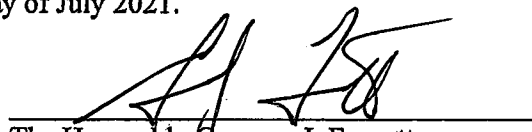
county jail, and against the United States DOJ. I'm claiming they are all in cahoots, in conspiracy." A court records review confirmed Del Campo as plaintiff in 6 lawsuits filed in New Mexico District Court which were all dismissed between July and September of 2020.

**Conclusion**

9. Based on all of the above information, your affiant submits there is probable cause to believe that Ramon Del Campo did Retaliate against a federal official, in violation of 18 U.S.C. § 115(a)(1)(B).
10. Prosecution of Ramon Del Campo was approved by Assistant United States Attorney Aaron O. Jordan.

  
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Kyle M. Seraphin  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn before me this 19<sup>th</sup> day of July 2021.

  
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The Honorable Gregory J. Fouratt  
United States Magistrate Judge